

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

Criminal Case No. 20-62WES

v.

BERNARD KLEIN

GOVERNMENT'S MOTION FOR ENTRY OF A RESTITUTION ORDER

Pursuant to 18 U.S.C. §§ 3663A and 3664, the United States of America, moves the Court for entry of an order of restitution providing for the following:

1. Restitution in the amount of \$626,355.51 payable to Massif, 498 Oak Street, Ashland, OR 97520, which represents the profits lost by Massif from the defendant's sale of counterfeit Massif products to Ramin Kohanbash.
2. Restitution in the amount of \$64,320 payable to United, 376 Dry Bridge Road, E-1, North Kingstown, RI 02852, which represents the profits lost by United from the defendant's sale of counterfeit United products to Ramin Kohanbash.
3. Restitution in the amount of \$1,943,679.47 payable to Polartec, LLC, 300 Brickstone Square, 4th Floor, Andover, MA 01810, which represents the profits lost by Polartec from the defendant's sale of counterfeit Polartec products to Ramin Kohanbash.
4. Restitution in the amount of \$17,575.74 payable to Insect Shield LLC, 814 West Market Street, Greensboro, NC 27401, which represents the profits lost by Insect Shield from the defendant's sale of counterfeit Insect Shield products to Ramin Kohanbash.
5. Restitution in the amount of \$91,188 payable to Nextec Applications, Inc., 3624 Lake Ridge Road, Fallbrook, CA 92028, which represents the profits lost by Nextec from the defendant's sale of counterfeit Nextec products to Ramin Kohanbash.

The defendant objects to the entry of a restitution order as requested by the government. Despite the parties' best efforts, they have been unable to reach an agreement. Accordingly, the parties request a brief scheduling conference with the Court to discuss the matter and to set an appropriate briefing schedule.

Respectfully submitted,

UNITED STATES OF AMERICA
By its Attorney,

RICHARD B. MYRUS
Acting United States Attorney

/s/ Sandra R. Hebert
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CERTIFICATE OF SERVICE

On this 16th day of August 2021, I filed the above Motion for Entry of Restitution Order using the Court's electronic filing system.

/s/ Sandra R. Hebert
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